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January 8, 2025

Via ECF

Hon. Natasha C. Merle
United States District Court
For the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Correa Morales v. Escobar Restrepo*
Civ No. 24-7951

Dear Judge Merle:

The parties jointly submit this letter in accordance with the Scheduling Order entered by the Court on December 23, 2024. The parties hereby certify that they have turned over their respective responses to one another's initial Requests for Production. In addition, today, January 8, 2025, Petitioner turned over supplemental responses to Respondent's Request for Production.

In light of the expedited discovery schedule in this matter, it is likely that the parties will continue to turn over supplemental responses to the Requests for Production over the next 48 hours. For this reason, the parties jointly request that the deadline for submission of motions *in limine* be extended to Monday, January 13, 2025, with any responses thereto due January 15, 2025. The parties acknowledge that the Court's Individual Rules require such requests be made two business days prior to any due date, and respectfully request that the Court nonetheless consider the instant request for good cause, in light of the unusually rapid pace of these proceedings and the little time the parties have had to examine the responsive discovery material.

In addition, the parties respectfully request clarification as to the deadline for submission of exhibits. The aforementioned Scheduling Order directs the parties to submit their exhibits by January 9, 2025, but said Order was entered when trial was expected to commence in mid-January. Now that the trial date has been continued to February 5 and 6, it would be consistent with the Court's practices and Individual Rules, and preferable to the parties, if the deadline for exchange of exhibits and exhibit lists be moved to the week of January 27, 2025.

Respectfully submitted,

/s/ Edgar Loy Fankbonner
Edgar Loy Fankbonner

cc: Camilla Redmond, Richard Min,
Michael Banuchis, *via email*